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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

GARLAND HENDERSON, an Individual

Plaintiff,

v.

CLARK COUNTY SCHOOL DISTRICT,

Defendants,

CASE NO.: 2:19-cv-01631-APG-NJK

STIPULATION AND ORDER
TO
EXTEND TIME FOR PLAINTIFF
TO RESPOND
TO
DEFENDANT'S MOTION TO DISMISS
[FIRST REQUEST]

Plaintiff Garland Henderson and Defendant Clark County School District, by and through their respective attorneys of record, hereby stipulate to extend the time for Plaintiff to respond to Defendant's Motion to Dismiss (# 10) to 14 days from the 30th of October, 2019 until the 13th of November, 2019.

Plaintiff asserts good cause is shown for requesting this extension of time after the 30th of October, 2019, the date the Response was due as follows:

Plaintiff's firm represents a client in state administrative proceeding involving in excess of \$100,000.00. On the 24th of October, 2019, the firm received a notice of expedited hearing set for October 30th, 2019 in the matter which required substantially all of the firm's resources to address. In addition, the firm had deadlines for responding to two Motions for Summary Judgment and two joinders therein consisting of more than 60 pages of briefing in Bynum v NLV, pending in the US District Court for the District of Nevada (1:17-cv-2102). The firm

1 became overtaxed and the deadline for the response in the instant matter was not addressed.

2 Plaintiff seeks the extension of time to allow sufficient time to prepare an appropriate
3 response to the Motion to Dismiss.

4 Based on the foregoing, the parties hereby stipulate to a short extension of time, until
5 November 13, 2019, for Plaintiff to respond to Defendant's Motion to Dismiss. The one
6 extension will have no significant or prejudicial impact on the proceedings.

7 This request is made in good faith and not for the purpose of delay.

8 Dated November 1, 2019

Dated: November 1, 2019

9 LAW OFFICE OF DAN M. WINDER P.C.


CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

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11 By: /s/ Dan M. Winder
12 Dan. M. Winder, Esq. (#1569)
13 3507 W. Charleston Blvd.
14 Las Vegas, NV 89102
15 *Attorney for Plaintiff*

By: /s/ Crystal J. Herrera
Crystal J. Herrera (#12396)
5100 West Sahara Avenue
Las Vegas, Nevada 89146
Attorney for Defendant

16 **ORDER**

17 **IT IS SO ORDERED.**

18
19 
20 UNITED STATES DISTRICT JUDGE
21 Dated: November 1, 2019.

22 **CERTIFICATE OF SERVICE**

23 I hereby certify I served the foregoing unsigned Order on the parties of record via the Court's ECF on the
24 date stamped hereon.

25 /s/Brittney Reid
26 Brittney Reid
An employee of the Law Office of Dan M. Winder